

Karen Hanson Riebel  
khriebel@locklaw.com  
Direct: 612.596.4097



MINNEAPOLIS  
Suite 2200  
100 Washington Avenue South  
Minneapolis, MN 55401-2179  
T 612.339.6900  
F 612.339.0981

June 21, 2018

The Honorable Vince Chhabria  
United States District Court  
Northern District of California  
450 Golden Gate Avenue, Courtroom 4  
San Francisco, CA 94102

Re: *In re: Facebook, Inc. Consumer Privacy User Profile Litigation*,  
Case No. 18-md-02843-VC (N.D. Cal.)

Dear Judge Chhabria:

Pursuant to this Court's Pretrial Order No. 1 (ECF No. 2), I respectfully submit this application to serve as Lead Counsel for all plaintiffs in *In re: Facebook, Inc. Consumer Privacy Litigation*, Case No. 18-md-02843 (N.D. Cal.) (the "Facebook litigation"). I am a partner with Lockridge Grindal Nauen P.L.L.P. ("LGN"), and counsel for Ashley Gennock and Randy Nunez in *Gennock and Nunez v. Facebook Inc. and Cambridge Analytica*, Case No. 3:18-cv-1891 (N.D. Cal.) (the "*Gennock* action"). As the enclosed resume indicates, I have extensive experience in multidistrict litigation ("MDLs"), particularly MDLs involving data breaches. I have served in leadership roles in matters involving consumer, medical, and technology-based data breaches, and am familiar with the common law, statutory, and state-specific claims to be litigated in the instant lawsuit. In particular, my service on the Plaintiffs' Executive Committee in the Yahoo! Inc. Customer Data Security Breach Litigation currently pending in the Northern District of California before the Honorable Lucy Koh demonstrates my experience with multidistrict litigation, the subject matter of this litigation and the claims currently before the Court. *See In re Yahoo! Inc. Customer Data Security Breach Litig.*, Case No. 16-md-02752-LHK (N.D. Cal.). That case, in particular, involves similar claims as those asserted in many of the underlying complaints here, and was litigated extensively in multiple motions to dismiss, and has now proceeded to discovery.

While my service in the Yahoo! Inc. Customer Data Security Breach Litigation and as listed on the enclosed resume speak to my extensive experience with multidistrict litigation and the claims before the Court, I recognize that they may call into question my ability to dedicate adequate time to the Facebook litigation. However, I want to assure the court that I, and my firm, have more than adequate time and resources to dedicate to the Facebook litigation, which I recognize will be time-consuming. We have more than 40 attorneys, in addition to 10 paralegals, at our firm, and I am able to count on a large internal team to manage the Facebook litigation should I be appointed to a leadership position by Your Honor. That ability exists now, and will

District Judge Vince Chhabria  
June 21, 2018

continue for the foreseeable future. As a long-time advocate for individuals and small businesses who have been harmed by inadequate security and attention to privacy in data breach and consumer privacy litigation, I am committed to ensuring that the plaintiffs in the Facebook litigation are represented fully and fairly. I am prepared to dedicate all necessary time to ensure the just, speedy, and inexpensive determination of all claims in this lawsuit.

In addition, my law firm is well-funded and can manage the expense of this type of litigation with no trouble – Lockridge Grindal Nauen was started in 1978 and is one of the preeminent class action law firms in the country. We have vast experience representing consumers, banks, financial institutions, small businesses, and others in complex litigation. LGN attorneys have served as lead or co-lead counsel in numerous consumer, antitrust, securities, data breach, data privacy, and other class actions over the past forty years. The enclosed resume shows that while I have only served as co-lead counsel in a handful of cases, my track record for team work and leadership in MDL cases is extensive.

The enclosed resume also shows that during my more than 27 years of litigation practice, I have worked cooperatively with firms across the country – in supporting and in leadership roles. In fact, I have worked with nearly every law firm that has entered an appearance in this litigation over the years, and developed not only excellent, cooperative working relationships, but enduring friendships with many of the attorneys working on this litigation on behalf of plaintiffs. I also believe that I am well-respected and have excellent working relationships with defense counsel across the country – many of which have also developed into close friendships. This collaborative approach is supported by the attached list of other counsel who have filed cases in the Facebook litigation who support my appointment to a leadership position. Should I be appointed, I will work diligently, cooperatively, effectively, and collaboratively with my colleagues on behalf of plaintiffs and the Class.

Finally, I am very aware that fees and expenses must be managed carefully, and am committed to the maintenance of reasonable fees and expenses in the Facebook litigation. I have extensive experience managing time and expense reports in multidistrict litigation, including the Target Data Breach Litigation, which resulted in a hard-fought settlement for the class. *See In re Target Corp. Customer Data Security Litig.*, No. 14-md-02252 (D. Minn.). I also have experience following, and am more than willing to follow, protocols like that established in the Yahoo! Data Breach Litigation, in which the parties have both compiled time and expense reports for *in camera* review as necessary and also have sought court approval for use of additional counsel when necessary. I would never compromise the quality of work or my dedication to obtain justice for my clients in the *Gennock* action, plaintiffs in the other underlying lawsuits, and the Class, and believe that my experience and track record show my ability to do so while maintaining reasonable fees and expenses.

I am happy to provide additional information, references, and documentation upon request. Thank you for your consideration.

District Judge Vince Chhabria  
June 21, 2018

Respectfully Submitted,

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

s/ Karen Hanson Riebel

Karen Hanson Riebel

KHR/crj

Attachments: Resume of Karen H. Riebel; List of Supporting Counsel